



Lori G. Cohen
Tel 678.553.2385
Fax 678.553.2386
cohenl@gtlaw.com

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VIA CM/ECF AND ELECTRONIC MAIL

The Honorable Joel Schneider
United States Magistrate Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101
[856-757-5446](tel:856-757-5446)
[856-757-5355](tel:856-757-5355) (fax)

**Re: *In re Valsartan Products Liability Litigation*, U.S. District Court for the
District of New Jersey; Case No. 1:19-md-02875-RBK-JS**

Dear Judge Schneider:

Enclosed are drafts of the three proposed Plaintiff Profile Forms prepared by the parties. Following several meet and confers, the parties have a fundamental macro dispute, and once that issue is resolved the content of the profile forms can be easily addressed. Plaintiffs propose that the profile forms provide extensive information, including relevant documents, authorizations, and verification by the plaintiff – in return limiting the plaintiff fact sheets only to those plaintiffs selected for bellwether discovery. Defendants do not agree to this process and want all plaintiffs to provide profile forms and fact sheets. Subject to resolution of this fundamental issue, the parties agree on most provisions in the Personal Injury and Putative Consumer Class Action profile forms. The three areas on these forms that remain in dispute (subject in part to resolution of the issue described above) are:

- (1) whether the forms should be verified;
- (2) whether responding Plaintiffs should be required to complete the proposed authorizations for medical, pharmacy, billing, and insurance records; and
- (3) the show cause process to be implemented.

These disputed provisions are highlighted in the attached forms for the Court's reference, and the parties' respective positions were addressed in part in the joint agenda submitted on May 24, 2019. (Doc. 107). The parties will be prepared to discuss each issue in dispute at the conference.

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Defendants believe the Profile Forms should be produced now in all cases and in a timely fashion as new cases are filed. Defendants propose the parties continue to meet and confer on timing and scope of plaintiff fact sheets related to the overall discovery schedule as that issue is not ripe yet.

There are outstanding issues pertaining to the Putative Third Party Payer Profile Form which the parties anticipate being able to resolve or narrow further. In light of this, the parties propose that the Third Party Payer Profile Form be addressed during the next scheduled discovery teleconference.

The parties look forward to discussing these issues with the Court during the May 29, 2019, in-person Case Management Conference.

Respectfully,

/s/ Lori G. Cohen
Lori G. Cohen, Esq.
*Attorney for Teva Pharmaceuticals USA,
Inc. and Teva Pharmaceutical Industries
Ltd.*

Enclosures

cc: Victoria Lockard, Esq. (*via email*)
Brian Rubenstein, Esq. (*via email*)
Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
Daniel A. Nigh (*via email*)
Seth A. Goldberg, Esq. (*via email, for distribution to Defendants' Counsel*)
Richard Smith, Esq. (*via email*)
Clem C. Trischler, Esq. (*via email*)